

Amanda M. Perach, Esq. (NSBN 12399)
 Karyna M. Armstrong, Esq. (NSBN 16044)
 McDONALD CARANO LLP
 2300 West Sahara Avenue, Suite 1200
 Las Vegas, Nevada 89102
 Telephone: (702) 873-4100
aperach@mcdonaldcarano.com
karmstrong@mcdonaldcarano.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BETH MAZZA AND VICTORIA
 SIVRAIS,

Plaintiffs,

v.

LEADERSHIP BOOKS, INC. AND
 MICHAEL STICKLER, DOES 1-10,
 INCLUSIVE; ROE ENTITIES 1-10,
 INCLUSIVE,

Defendants.

Case No.: 2:25-cv-00232-CDS-BNW

**STIPULATED DISCOVERY PLAN AND
 SCHEDULING ORDER PURSUANT TO FED.
 R. CIV. P. 26(f)(3) AND LR 26-1**

**SUBMITTED IN COMPLIANCE WITH LR 26-
 1(b)**

Plaintiffs Beth Mazza and Victoria Sivrais (collectively "Plaintiffs"), Defendant Leadership Books, Inc. ("LBI"), and Defendant Michael Stickler ("Stickler" with LBI, collectively "Defendants" and with Plaintiffs, the "Parties") submit this Stipulated Discovery Plan and Scheduling Order pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(b).

I. INFORMATION PURSUANT TO FED. R. CIV. P. 26(f)

1. Rule 26(f) conference: Counsel for the parties participated in a Fed. R. Civ. P. 26(f) conference on June 9, 2025. Karyna M. Armstrong participated on behalf of Plaintiffs and Kevin F. Boyle participated on behalf of LBI and Stickler.

2. The Parties will exchange their respective Initial Disclosures on or before **June 23, 2025**, fourteen (14) days after the Rule 26(f) Conference. The Parties do not anticipate any changes to the timing, form, or requirement for such disclosures.

2. Subjects on which discovery may be needed: Unless otherwise limited by subsequent stipulations or orders, the Parties shall be allowed to conduct discovery within the scope of FRCP 26(a).

3. **Issues regarding disclosure or discovery of electronically stored information, including the form or forms in which it is produced:** No issues at this time. If any issues arise later, the Parties will meet and confer before involving the Court. The Parties have also undertaken efforts to retain any electronically stored information relevant to this matter and have agreed that, unless the requesting party asks for a definite and specific form, the party producing any electronically stored information need not provide such information in any certain form as long as the form provides the other party reasonable access to the information.

4. **Issues about claims of privilege or protection of trial preparation materials:** No issues at this time. If any issues arise later, the Parties will meet and confer before involving the Court.

5. **Limitations on discovery:** None.

6. **Other orders under Rule 26(c) or Rule 16(b) and (c):** None as of this date.

II. INFORMATION PURSUANT TO LOCAL RULE 26-1(b)

1. **Alternative dispute resolution:** The parties certify they have met and conferred about the possibility of using alternative dispute resolution processes. The parties have not agreed to use these processes currently but remain open to considering them after further progress in discovery.

2. **Alternative forms of case disposition:** The parties certify that they discussed and considered consenting to trial by a magistrate judge under 28 U.S.C. § 636(c) and FRCP 73 and the use of the Short Trial Program (General Order 2013-01). The parties do not consent to these options currently.

3. **Electronic evidence.** The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purpose of jury deliberations. The parties intend to meet and confer regarding electronic evidence should any disputes arise.

III. DISCOVERY PLAN UNDER LOCAL RULE 26-1(b) AND LOCAL RULE 26-3

The Parties propose the following deadlines:

1. **Initial disclosures:** June 23, 2025

McDONALD CARANO
 100 WEST LIBERTY STREET, TENTH FLOOR • RENO, NEVADA 89501
 PHONE 775.788.2000 • FAX 775.788.2020

- 1 **2. Discovery cut-off:** November 5, 2025¹
- 2 **3. Amend pleadings or add parties:** August 7, 2025
- 3 **4. Expert disclosures:** September 5, 2025
- 4 **5. Expert rebuttal disclosures:** October 6, 2025
- 5 **6. Dispositive motions:** December 5, 2025
- 6 **7. Pretrial order:** January 5, 2026. In the event dispositive motions are filed, the
- 7 deadline for filing the joint pretrial order shall be suspended until 30 days after decision on the
- 8 dispositive motions or further court order.
- 9 **8. Pretrial disclosures:** The disclosures required by FRCP 26(a)(3) and any objection
- 10 thereto shall be included in the Pretrial Order.


11 DATED this 23rd day of June, 2025.
 12 McDONALD CARANO LLP

DATED this 23rd day of June, 2025.
 LAW OFFICE OF KEVIN F. BOYLE

13 By: /s/ Amanda Perach
 14 Amanda M. Perach, Esq. (NSBN 12399)
 15 Karyna M. Armstrong, Esq. (NSBN 16044)
 16 2300 West Sahara Avenue, Suite 1200
 17 Las Vegas, Nevada 89102
 18 *Attorneys for Plaintiffs*

By: /s/ Kevin Boyle
 Kevin F. Boyle, Esq. (NSBN 14834)
 5465 Cardinal Ridge Court
 Las Vegas, Nevada 89149
Attorney for Defendants

19
 20 **IT IS SO ORDERED.**

21
 22 
 23 UNITED STATES MAGISTRATE JUDGE
 24 DATED: June 24, 2025

25
 26
 27
 28 ¹ Defendants first appeared in this matter on May 9, 2025. See ECF No. 15.

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of June, 2025, a true and correct copy of
**STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER PURSUANT TO FED.
R. CIV. P. 26(f)(3) AND LR 26-1** was served via the United States District Court CM/ECF
system on all parties or persons requiring notice.

By: /s/ Kimberly Kirn

An employee of McDonald Carano LLP